

COMMONWEALTH OF MASSACHUSETTS

THE TRIAL COURT

SUPERIOR COURT DEPARTMENT

SUFFOLK, ss.

Civil Action No. 2584CV02961 ^D

SANDRA FROMMER,
Plaintiff, Pro Se

v.

LA CASA ZONE LLC, and MOHAMED KASSEM,
individually and as manager of La Casa Zone LLC,
Defendants.

CERTIFICATE OF COMPLIANCE WITH SUPERIOR COURT RULE 9C

I, Sandra Frommer, hereby certify that I have complied with the requirements of
Superior Court Rule 9C.

Specifically:

1. On December 15, 2025, I initiated contact with defense counsel, Attorney Grant B. Hecht, to coordinate discovery in good faith.
2. On December 23, 2025, I served Defendants with Interrogatories, Requests for Production of Documents, and a Request for Insurance Disclosure pursuant to the Massachusetts Rules of Civil Procedure.
3. After Defendants failed to respond within the required time period, I contacted defense counsel again on January 26, 2026, requesting compliance and attempting to resolve the matter without Court intervention.

4. Defense counsel represented that responses would be provided but failed to produce any discovery responses or objections.

5. On January 31, 2026, I served Defendants with a Motion to Compel Discovery and again offered to confer in good faith.

6. Despite these repeated efforts, Defendants have failed to provide discovery responses , answer my emails or otherwise resolve this dispute.

Accordingly, I have made good faith efforts to confer with Defendants to resolve this discovery dispute but have been unable to do so, making Court intervention necessary.

Signed under the pains and penalties of perjury,

/s/ Sandra Frommer
Sandra's Frommer

Plaintiff, Pro Se

Date: February 18, 2026

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(617) 806-6566

CERTIFICATE OF SERVICE

I hereby certify that on February 18, 2026 a copy of the foregoing was served electronically on all counsel of record.

Grant B. Hecht, Esq.
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Brookline, MA 02446
Tel: (617) 487-5801

Respectfully submitted,

SANDRA FROMMER, Pro Se Plaintiff

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/s/ Sandra Frommer
Sandra's Frommer